

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re Entresto (Sacubitril/Valsartan) Patent
Litigation

C.A. No. 20-2930-RGA

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

MSN PHARMACEUTICALS INC.,
MSN LABORATORIES PRIVATE
LIMITED, MSN LIFE SCIENCES
PRIVATE LIMITED, GERBERA
THERAPEUTICS, INC., NANJING
NORATECH PHARMACEUTICAL CO.,
LIMITED,

Defendants.

C.A. No. 22-1395-RGA

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

GERBERA THERAPEUTICS, INC.,
NANJING NORATECH
PHARMACEUTICAL CO., LIMITED,

Defendants.

C.A. No. 23-401-RGA

**MOTION FOR EXEMPTION OF PERSONS FROM THE DISTRICT
OF DELAWARE’S MAY 17, 2024 STANDING ORDER ON PERSONAL DEVICES**

Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”) moves for an order to exempt certain persons from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the

J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of the Motion, Novartis states the following:

1. The District of Delaware’s May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.

2. A Pretrial Conference is currently scheduled for November 22, 2024 before Judge Richard G. Andrews.

3. Jared L. Stringham and Shannon Clark from Venable LLP are counsel of record for the Plaintiff, are admitted *pro hac vice* in these matters, and intend to appear at the pretrial conference on Plaintiff’s behalf. Counsel request access to their electronic devices and equipment to the courthouse in connection with the conference, but do not have a hard-copy state-issued bar card, and/or do not otherwise meet the exemptions listed in the May 17, 2024 Standing Order.

4. Robert Stanley and Jean Silveri (in-house counsel and for Novartis) will be in attendance at the pretrial conference and require access to their personal electronic devices and connectors. Mr. Stanley and Ms. Silveri do not have a hard-copy state-issued bar card, and/or do not meet any of the exemptions to Paragraph 4 of the May 17, 2024 Standing Order.

5. Novartis respectfully requests that the Court issue an order, in the form attached hereto, to exempt certain persons from the District of Delaware’s May 17, 2024 Standing Order.

Dated: November 21, 2024

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